



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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MEMORANDUM

DATE: July 5, 1984

EPA Region 5 Records Ctr.

JUL 10 1984

TO: Division File



393310

**E.P.A. — D.L.P.C.
STATE OF ILLINOIS**

FROM: Mike Grant

SUBJECT: LPC 11904006 - Madison County - Granite City/Reilly Tar & Chemical Corporation
ILD005278360

An inspection was conducted on June 26, 1984 at Reilly Tar and Chemical Co. in Granite City, Illinois by Pat McCarthy and myself. Representing Reilly Tar was Larry Pirtle, their Plant Manager. Reilly Tar's Part B application is due in mid-July. Contingency Plan, Closure Plan, inspection reports and all other documents were contained within. We reviewed the necessary documents which are required under Interim Status Standards. We noted a few apparent violations of these standards.

Not all facility personnel who come in contact with the hazardous waste have received hazardous waste management training. The supervisors of Reilly Tar had just received their initial training as of June 20, 1984, with the exception of Larry Pirtle, who received his in 1980. Therefore, annual training updates have not taken place and new employees do not receive training within six months after they are hired. The training plan outlined seems to contain all aspects of the requirements: job descriptions, emergency procedures, etc. As previously noted, the program has not yet been fully implemented. Therefore, records that document training of the personnel were not complete.

The contingency plan did not describe the arrangements agreed to by the local authorities. Mr. Pirtle told us copies of the contingency plan had been submitted to the Granite City Police and Fire Departments, and also to St. Elizabeth's Hospital, however, no documentation of the agreements had been received, nor had Reilly Tar requested any. An operating record was available, but was not kept together. By searching through the Part B application, I was able to find all of the required information that is required in an operating record with the exception of tank inspections, which is discussed next.

The wastewater treatment plant is used to treat processed wastewater prior to discharge into the surface impoundment. Reilly Tar's goal is to be allowed to hook up to Granite City's sewer line and discharge following pre-treatment. The tanks are both open and closed tops. The sludge, which is a result of the treatment, is a listed hazardous waste (K035). These tanks are regulated under Interim Status. No tank inspections are being conducted, therefore, there are no inspection records. This is an apparent violation of general inspection requirements, the contents of an operating record, and inspection requirements under Subpart J: Tanks. The sludge from the process is put into containers and stored in the waste storage building, as is the waste pile. The drums will be sent to TWI for incineration, when an Agency permit is issued. The waste pile contains creosote (U051), which comes from the process area and the cleaning of railroad tank cars. The waste pile is sent to Bob's Home Service in Missouri, using Missouri manifests. This is an apparent violation, as copies of the manifest are not submitted to our Agency. The waste storage building has about a four foot containment wall and seemed to meet the requirements.

July 5, 1984

Treated effluent from the WWTP is discharged into the surface impoundment. Prior to construction of the treatment plant, wastewater was pumped directly to the surface impoundment. The surface impoundment was then emptied and treated in the plant, however the sludge and contaminated soil was not removed. The effluent from the plant which is "non-hazardous" is pumped into the surface impoundment still containing hazardous sludge; this activity is permitted through Water Pollution Control (Permit No. 1983-EA-1020). This mixture results in a hazardous waste, unless the facility samples and tests for the parameters which would prove the mixture doesn't exhibit K035 characteristics. The surface impoundment was not being maintained at a two foot freeboard level, during our inspection. Mr. Pirtle stated that this problem was a result of the rains over the weekend. When asked what was done when the level of the surface impoundment got too high, we were told it was pumped into the adjacent field. Mr. Pirtle told us they consider this discharge to be "non-hazardous"; and that biological treatment is being conducted in the impoundment using mutant bacteria to decompose the sludge. However, no analytical tests are done to determine whether this process is successful. We were also told, prior to the construction of the treatment plant, the untreated wastewater was pumped into the field, when high levels existed in the surface impoundment. As mentioned before, this discharge is defined as hazardous unless Reilly Tar provides lab results proving otherwise. Mr. Pirtle stated no sampling or lab tests are conducted in the surface impoundment prior to discharge onto the field. The field lies west of the impoundment and is approximately one acre in size. (See Photo.)

Apparent violations observed June 26, 1984 are as follows:

- Section 725.115(b)(1)
- " 725.115(b)(2)
- " 725.115(d)
- " 725.116
- " 725.152(c)
- " 725.123(a)(4)
- " 725.173(b)(5)
- " 725.294(a)-(e)
- " 725.322

The CIL associated with this inspection will contain the above apparent violations and a request that the facility submit appropriate analyses to the Agency demonstrating that the discharge from the surface impoundment to the field is not hazardous. The analyses must be conducted in compliance with Section 721.103 and Appendix VII.

MDG:jlr

cc: Southern Region

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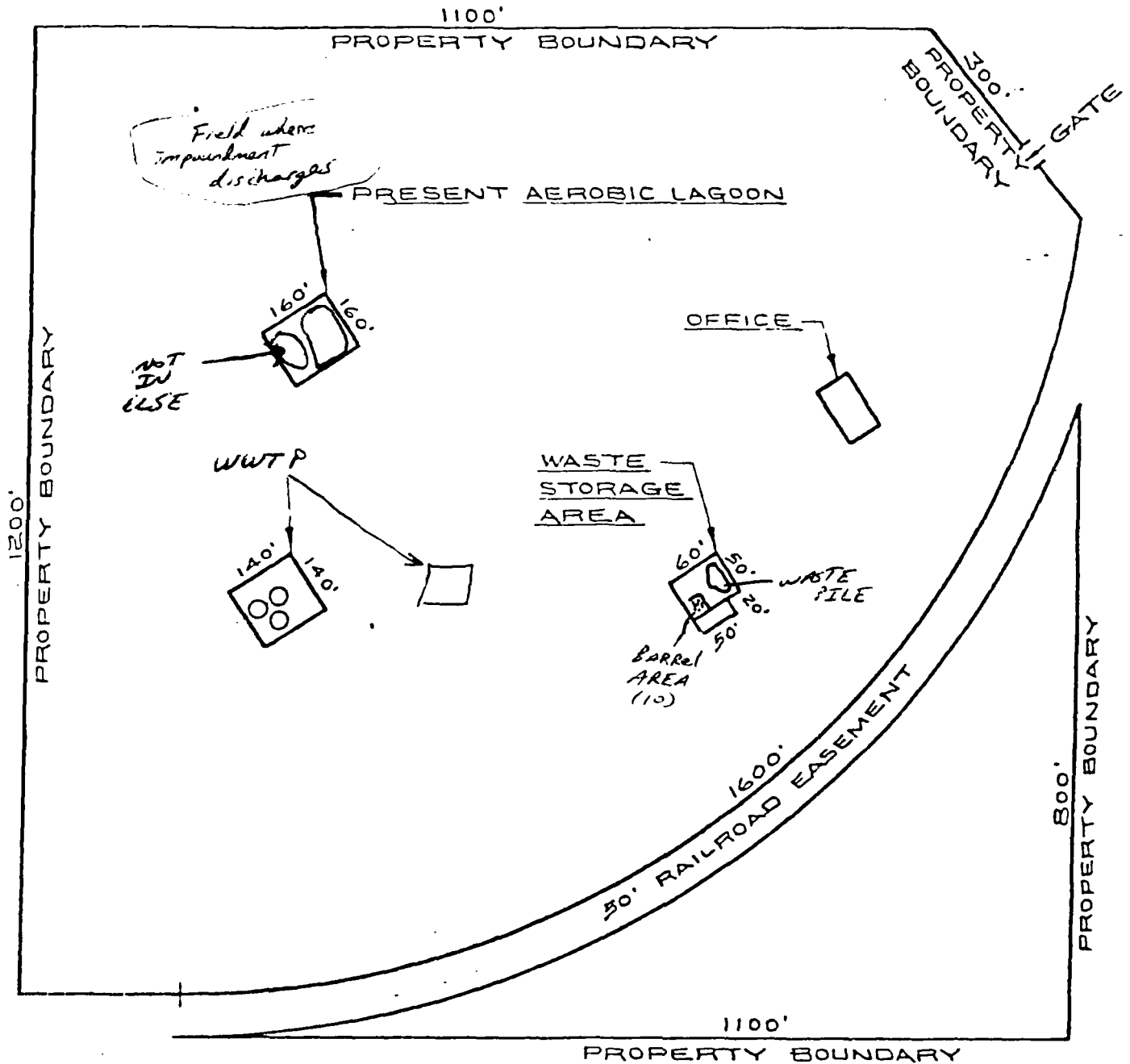
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11904006
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD006278360
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Reilly Tar + Chemical Corporation
(B) Street: 17TH + Edwardsville Road
(C) City: Granite City (D) State: IL (E) Zip Code: 62040
(F) Phone: 618-452-3141 (G) County: Madison
(H) Operator: Reilly Tar + Chemical Corp
(I) Street: 17TH + Edwardsville Rd
(J) City: Granite City (K) State: IL (L) Zip Code: 62040
(M) Phone: 618-452-3141 (N) County: Madison
(O) Owner: Reilly Tar + Chemical Corp
(P) Street: 151 North Delaware Street Suite 150
(Q) City: Indianapolis (R) State: IN (S) Zip Code: 46204
(T) Phone: 317-638-7531 (U) County: Marion
(V) Date of Inspection: 6/26/84 (W) Time of Inspection (From) 9:00 (To) 12:30
(X) Weather Conditions: Overcast, 80°

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(Y) Person(s) Interviewed

Title

Telephone

Larry PirTie

Plant Manager

618-452-3141

(Z) Inspection Participants

Agency/Title

Telephone

Pat McCarthy

IEPA/EPs

618-345-4606

Mike Grant

IEPA/LSCT

" "

(AA) Preparer Information

Name

Agency/Title

Telephone

Mike Grant / Pat McCarthy

IEPA/LSCT+EPs

618-345-4606

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- ☒ A. Storage and/or Treatment
- ☒ ① Containers (I)
 - ☒ ② Tanks (J)
 - ☒ ③ Surface Impoundments (K)
 - ☒ ④ Waste Piles (L)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

☐ D. Incineration and/or Thermal Treatment (O and P)

☐ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	NA	—
2. Facility expansion?	✓	—	—	Waste Water Treatment Plant
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	—
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	—
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	NA	only handle waste generated in process on-site.
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	Guard walks perimeter checkpoints during off-hours of operation.
2. Artificial or natural barrier around facility?	✓	—	—	—
3. Controlled entry?	✓	—	—	—
4. Danger sign(s) at entrance?	✓	—	—	—
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	✓	—	—
2. Records of operator error?	—	✓	—	—
3. Records of discharges?	—	✓	—	—

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III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	① - See remarks page at the back of inspection report
5. Safety, emergency equipment?	✓	---	---	-----
6. Security devices?	✓	---	---	-----
7. Operating and structural devices?	---	✓	---	①
8. Inspection log?	---	✓	---	①
 (E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓	---	---	-----
2. Job descriptions?	✓	---	---	-----
3. Description of training?	✓	---	---	-----
4. Records of training?	---	✓	---	only supervisors have been trained, as of 6/20/84
5. Have facility personnel received required training by 5-19-81?	---	✓	---	↑
6. Do new personnel receive required training within six months?	---	✓	---	-----
 (F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	---	---	NA	-----
2. No smoking signs?	---	---	NA	-----
3. Separation and protection from ignition sources?	---	---	NA	-----

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IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— ✓ —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

✓ — —

Telephones + steamwhistle

2. Telephone or 2-way radios
at the scene of operations?

✓ — —

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ — —

75 extinguishers

Indicate the volume of water and/or foam available for fire control:

11 hydrants, 710 gpm which was checked 5/27/83

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ — —

2. Is emergency equipment
maintained in operable
conditions?

✓ — —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

✓ — —

waste only handled during
the day, supervisor equipped
with pager

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(E) Is there adequate aisle space for unobstructed movement?

☒ ☐ ☐

only 10 drums in storage

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

☒ ☐ ☐

☐ ☒ ☐

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No documents showing agreements made with local authorities

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V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

Yes No NI* Remarks

(B) Are copies of the Contingency Plan available at site and local emergency organizations?

✓

(C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

✓

2. Is coordinator familiar with all aspects of site operation and emergency procedures?

✓

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓

(D) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

NA

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

Yes No NI* Remarks

(A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each manifest?

✓

NA

No waste received ~~and~~
waste generated on-site

2. Are records of past shipments retained for 3 years?

✓

NP

(B) Does the owner or operator meet requirements regarding manifest discrepancies?

NA

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VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

c. The location and quantity of each hazardous waste within the facility?

✓

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

NA

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

No Tank inspections documented.

f. Reports detailing all incidents that required implementation of the Contingency Plan?

NA

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

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VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

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Yes No NI*

Remarks

(A) Closure and Post Closure

1. Is the facility closure plan available for inspection by May 19, 1981?

✓

2. Has this plan been submitted to the Regional Administrator

✓

3. Has closure begun?

✓

4. Is closure estimate available by May 19, 1981?

✓

(B) Post closure care and use of property

Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)

NA

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I

USE AND MANAGEMENT OF CONTAINERS

Facility Name: Railly Tar & Chemical

Date of Inspection: 6/26/84

Yes No NI*

Remarks

1. Are containers in good condition?

✓

2. Are containers compatible with waste in them?

✓

3. Are containers stored closed?

✓

4. Are containers managed to prevent leaks?

✓

5. Are containers inspected weekly for leaks and defects?

✓

6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)

NA

Waste is K035

Stored inside a building with waste pile, in a separate area

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	NA	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	NA	-----

J
TANKS

Facility Name: Reilly Tar + Chemical Date of Inspection: 6/26/84

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓	---	---	Waste water from process being treated in WWTP.
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓	---	---	equipped with level indicators + high volume Alarms
3. Do continuous feed systems have a waste-feed cutoff?	✓	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	NA	only wastewater from Cressite process treated in tanks.
5. Are required daily and weekly inspections done?	---	✓	---	No documented insp of tank treatment area being conducted. See ②
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	NA	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	NA	-----

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8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: VARIOUS SIZES gallons

Tank diameter: VARIOUS SIZES feet

Distance of tank from property line OVER 50 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: Railly Tar + Chemical

Date of Inspection: 6/26/84

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

✓

2. Do earthen dikes have protective covers?

✓

only on those areas that are diked.

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

NA

4. Is the freeboard level inspected at least daily?

✓

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

✓

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

NA

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

NA

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L

WASTE PILES

Facility Name: Reilly Tar + ChemicalDate of Inspection: 6/26/84

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	stored inside a building. Also area is diked.
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	waste coming from tank cars + spillage (creosote UOST)
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See #1 Remark
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<input type="checkbox"/>	<input type="checkbox"/>	NA	waste pile is UOST (creosote) waste
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	<input type="checkbox"/>	<input type="checkbox"/>	NA	
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input type="checkbox"/>	<input type="checkbox"/>	NA	
7. Are piles of incompatible waste protected by barriers or distance from other waste?	<input type="checkbox"/>	<input type="checkbox"/>	NA	

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	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	—
4. Are inspection procedures followed according to 265.403?	—	—	—	—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	—

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	—	—	Facility using Missouri Manifest only
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	—	—	—
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	—	—	—

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	✓	—	—	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓	—	—	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓	—	—	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	✓	—	—	_____
7. Required certification?	✓	—	—	_____
8. Required signatures?	✓	—	—	_____
(C) Does the owner or operator submit exception reports when needed?	—	NA	—	_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	—	—	✓	Applying for permit with TWI for Incineration
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	—	—	✓	Nothing being prepared to ship during our inspection
(C) If required, are placards available to transporters of hazardous waste?	—	NA	—	_____

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VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
--	--------------------------	--------------------------	-------------------------------------	--

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

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REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

On June 26, 1984 an ISS inspection was conducted at the Reilly Tar + Chemical Co. in Granite City, IL. to determine their compliance with Interim Status Standards. Pat McCarthy and myself of the IEPA were accompanied by Larry Pirtle, Plant manager of Reilly Tar.

Reilly Tar is a distiller of coal tar pitch to produce creosote oil and various grades of pitch. As a result of this process, creosote waste (K051) and wastewater treatment sludges (K035) are generated.

Apparent violations noted this date are as follows:

- Section 725.115 b) 1), b) 2), + d)
- Section 725.116
- Section 725.152 c)
- Section 725.173 b) 5)
- Section 725.294 a) - e)
- Section 725.322
- Section 722.123 a) 4) Failure to submit copies of the manifest to the Agency.

The above apparent violations are discussed in the inspection report with the exception of the following:

- ① Inspections are conducted and inspection schedules are maintained for the waste pile, containers, and the surface impoundment, but not the tanks associated with the treatment facility.
- ② Freeboard levels of open tanks must be inspected daily and tank integrity is to be inspected weekly.

The aforementioned apparent violations address those regulated units appearing on the Facility's Part A application. However another questionable area was observed. A field located west of the surface impoundment receives discharge from the impoundment when high levels occur. The impoundment contains treated wastewater which is non-hazardous but also contains K035 sludge and contaminated soil.

Remarks cont.

This mixture is defined as a hazardous waste. Therefore if analytical data showing that this discharge is non-hazardous cannot be produced then this will also be pursued as an apparent violation.

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